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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 23-cr-269 JSW-3
)	
Plaintiff,)	DECLARATION OF ALEXANDRA SHEPARD
)	IN SUPPORT OF UNITED STATES' POCKET
v.)	BRIEF ON DEFENDANT'S SUBPOENA OF
)	GOVERNMENT EXPERT IJAMES
DEVON CHRISTOPHER WENGER,)	
)	
Defendant.)	

I, Alexandra Shepard, declare as follows:

1. I am an Assistant U.S. Attorney in the Northern District of California. I am assigned to prosecute the above-captioned case.

2. The government retained Steve Ijames as an expert witness for a term beginning on August 4, 2023, to opine about the D.S. incident.

3. Mr. Ijames does not accept compensation for testimony in criminal cases.

4. The government provided Mr. Ijames' expert disclosure to the defense on or around October 29, 2024.

5. In preparing for the current trial in this matter, the government decided not to call Mr.

1 Ijames as an expert in its case in chief. However, the government planned to call Mr. Ijames in its
2 rebuttal case should the need arise.

3 6. As a courtesy, because the defense included Mr. Ijames' name in their opening slides, the
4 government notified defense counsel on the afternoon of Friday, September 5, that it didn't intend to call
5 Mr. Ijames in its case in chief.

6 7. Before 7 a.m. the next day, Saturday, September 6 the defense subpoenaed Mr. Ijames to
7 testify in their case in chief.

8 8. Mr. Ijames also notified government counsel that the defense advised him that they
9 would pay all of his fees and expenses to testify.

10 9. Attached as Exhibit A is a true and correct copy of the transcript of the February 10, 2025
11 Pretrial Conference in this matter.

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13 I declare under penalty of perjury that the foregoing is true and correct to the best of my
14 knowledge.

15 Executed this 9th day of September 2025 in Oakland, California

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17 /s/
ALEXANDRA SHEPARD
18 Assistant United States Attorney
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